

7002 '99 JUL 15 P2:15

6903 Frying Pan Rd
Boulder, Co 80301
July 11, 1999

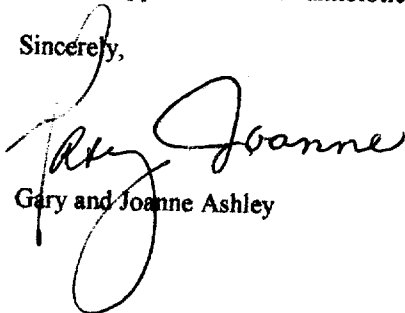
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

In reference to Docket #98N-1038, we send you a strong second to everything this article references. We support prominent labeling on irradiated food and oppose misleading labels such as electronic pasteurization or cold pasteurization. The label and the radura symbol should not expire.

We also oppose the use of antibiotics and hormones in U.S. agribusiness.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Joanne", is written over the typed name. The signature is fluid and stylized, with the first letters of each name being prominent.

Gary and Joanne Ashley

98N 1038

C3745

Brave new world of agribusiness

By Ron Forthofer

Are the Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) allowing policies which threaten our health? Are they putting the interests of agribusiness before ours? Are you concerned about the revolving door between industry and these agencies? For example, the pharmaceutical giant G. D. Searle & Co. recently announced the appointment of Michael A. Friedman as senior vice president. Most recently, Dr. Friedman was at the FDA, serving in a variety of roles, including acting commissioner.

These agencies seem to have adopted the position that processes used by agribusiness are safe until shown to be hazardous. However, by then, it may be too late. Instead, these agencies should require that independent studies demonstrate agribusiness processes are safe before they are used in uncontrolled experiments on humans. As an example of what happens when one accepts assurances from industry, recall the recent discovery that monarch butterflies were killed following the use of genetically-engineered corn despite industry's claims of no risks.

Three issues - the use of antibiotics, implantation of hormones and irradiation of food - where these agencies have sided with agribusiness are considered next.

1) The use of antibiotics by U.S. agribusiness is widespread with 40% of the antibiotics sold in the U.S. being used in agriculture. Their primary use is not to cure sick animals, but to increase weight gain in animals. The Centers for Disease Control (CDC) has concluded that antimicrobial use in food animals is the dominant source of antibiotic resistance among food-borne pathogens in the U.S. The CDC and the World Health Organization have called for an end to the use of drugs for growth promotion in animals if the drugs are also used in the treatment of human diseases. The FDA has yet to act.

2) Are you concerned about the hormones added to your meat? If you aren't, perhaps you should be. On May 3, an official European Union (EU) scientific panel issued a report which affirmed that at least one of six growth hormones contained in U.S. beef exports and banned by the EU can definitely cause cancer. The EU's Scientific Committee on Veterinary Measures reported that the hormone 17 beta-estradiol "has to be considered as a complete carcinogen." The panel stated moreover that all of the banned hormones "may cause a variety of health problems including cancer, developmental problems, harm to immune systems and brain disease... Even exposure to small levels of residues in meat and meat products carries risks..."

These hormones also cause cattle to grow faster, and most U.S. beef is now hormone-implanted. Yet lab rats fed these hormones have developed can-

cer, and at least three of the most commonly used beef hormones appear on state and federal lists as known carcinogens. Incredibly, the FDA and the USDA insist that these beef hormones are totally safe! They consequently claim hormone-tainted beef need not be labeled. Would we eat this meat if we were informed about the risks? Shouldn't there be la-

**ARE YOU
CONCERNED
ABOUT THE
HORMONES
ADDED TO YOUR
MEAT? IF YOU
AREN'T, PERHAPS
YOU SHOULD BE.**

belts which allow us to be informed consumers?

3) As a result of a suit brought by the National Food Processors Association, the FDA is exploring the possibility of allowing labeling of irradiated foods to expire. Currently, irradiated meat and produce must be labeled with a prominent "radura" symbol and statement that the product has been irradiated. Proposed alternative labels would utilize terms such as cold pasteurization or electronic pasteurization. The FDA is accepting comments about labeling of irradiated food until July 19th.

The numerous hazards associated with food irradiation are not the issue here. The question is whether or not we have the right to know if our food has been irradiated. Irradiation is being pushed by an embattled meat industry looking for cover in the wake of numerous recent food-borne illness outbreaks. The industry prefers irradiation instead of further cleaning up slaughter houses, slowing down the production line, stopping the feeding of antibiotics and rendered animal protein to livestock, and increasing the number of federal meat inspectors - all more productive and less hazardous measures to reduce food-borne illnesses.

Please contact the FDA and support the prominent labeling on irradiated food, and oppose misleading labels such as electronic pasteurization or cold pasteurization. Also, tell the FDA that the requirement for irradiation disclosure (both the label and the radura symbol) should not expire.

Send comments before July 19, 1999 to:

Dockets Management Branch
(HFA-305)

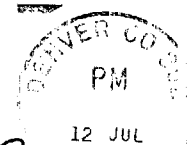
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852.

Refer to Docket #98N-1038

If you choose to use e-mail, be sure to include the docket # in the subject of the e-mail and send your message to FDADocket-s@oc.fda.gov.

Ron Forthofer lives in Boulder.

Gary and Joanne Ashley
6903 Frying Pan Road
Boulder, CO 80301



Dockets Management Branch
HFA-305
Food and Drug Administration
5630 Fisher's Lane, Room 1061
Rockville, MD 20852

20857/0001

